

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MEGATEL HOMES, LLC, and ZACH
IPOUR,

Plaintiffs / Counter-defendants,

v.

CRYSTAL LAGOONS U.S. CORP.,

Defendant / Counter-plaintiff.

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CIVIL ACTION NO. 3:22-CV-1715-X

CRYSTAL LAGOONS' EXPERT DISCLOSURES

Pursuant to the Court's Scheduling Order (Dkt. 18) and the parties' written agreement, Defendant/Counter-Plaintiff Crystal Lagoons U.S. Corp. ("Crystal Lagoons") provides the following disclosure of the experts Crystal Lagoons has retained or specifically employed who may testify and present evidence under Federal Rules of Evidence 702, 703, and/or 705:

1. Richard F. Bero
The BERO Group
N27 W23960 Paul Road, Suite 202
Pewaukee, Wisconsin 53072
(262) 522-7922

Mr. Bero is expected to testify regarding the damages Crystal Lagoons has incurred or will in reasonable likelihood incur in connection with the allegations set forth in Counts I and II of Crystal Lagoons' Original Answer and Counterclaims to Plaintiffs' First Amended Complaint (Dkt. 10). Mr. Bero's CV is attached hereto as **Exhibit 1**.

2. Richard D. Anigian
Haynes Boone LLP
2323 Victory Ave., Suite 700
Dallas, Texas 75219
(214) 651-5633

Mr. Anigian is expected to testify regarding the reasonable and necessary attorneys' fees incurred in this litigation, including as to the hourly rates charged and the relevant experience and skill of the attorneys working on this matter and matters of similar complexity. Mr. Anigian's CV is attached hereto as **Exhibit 2**.

Dated: March 20, 2023

Respectfully submitted,

/s/ Richard D. Anigian

Richard D. Anigian

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**ATTORNEYS FOR DEFENDANT
CRYSTAL LAGOONS U.S. CORP.**

CERTIFICATE OF SERVICE

The undersigned counsel for Defendant hereby certifies that on March 20, 2023, a true and correct copy of the above and foregoing document was served upon all counsel of record in accordance with the Federal Rules of Civil Procedure.

/s/ Richard D. Anigian

Richard D. Anigian